

1 approximately April 2009, all in violation of 18 U.S.C. § 1084 and other federal anti-gambling
2 statutes. A principal situs of that illegal operation was Las Vegas, Nevada.

3 Pursuant to plea negotiations between Mr. Gariti and the Government, on September 24,
4 2009, Mr. Gariti entered a change of plea before this Court.

5 In the meantime, the Government has a deadline, under the strictures of 18 U.S.C. § 983
6 (a)(3)(A), to file its forfeiture complaint, regarding the above-captioned currency, no later than
7 December 28, 2010.

8 The criminal case will not be disposed of by the time the Government is required to file its
9 complaint. However, counsel for the United States believes that there will be a final disposition of
10 this matter before the expiration of the time period for the continuance requested herein; making
11 further requests for continuances unnecessary.

12 Finally, on December 27, 2010, defendant's counsel, Margaret Stanish, agreed to the
13 extension of time and authorized counsel for the United States to file this Unopposed Motion with this
14 Court. Because the parties have agreed to the extension of time to file a Civil Complaint For
15 Forfeiture In Rem and to facilitate a final universal plea/sentencing disposition, this Court should
16 extend the time.

17 This motion is not submitted solely for the purpose of delay or for any other improper
18 purpose.

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1 WHEREFORE, the United States moves this Court to grant its motion to extend the time for
2 the United States to file its civil complaint in the above-captioned matter for an additional 120 days,
3 or until April 27, 2011.

4 DATED this 27^h day of December, 2010.

5 Respectfully submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/Michael A. Humphreys
9 MICHAEL A. HUMPHREYS
10 Assistant United States Attorney

11 IT IS SO ORDERED:

12 DATED this 15th day of January, 2011

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17 LARRY R. HICKS
18 UNITED STATES DISTRICT JUDGE
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